

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

INA STEINER, DAVID STEINER, and STEINER ASSOCIATES, LLC)	
)	
)	
Plaintiffs,)	
)	
v.)	
)	
EBAY, INC., et al.,)	
)	
Defendants.)	
)	

Civil Action No. 1:21-cv-11181-PBS

PLAINTIFFS' PROPOSED VOIR DIRE QUESTIONS

Plaintiffs respectfully request that the Court ask or permit counsel to ask the following questions during voir dire, unless the parties and the Court agree to agree to a written juror questionnaire. Plaintiffs reserve the right to propose additional voir dire questions.

1. How would you describe your general feelings about large technology companies such as Apple, Google, Meta, Amazon, or eBay?

2. Do you believe major tech companies generally act responsibly, or do you think they sometimes go too far in protecting their image or interests?

3. This case involves several parties and related persons or companies. The following is a list of those parties, state whether you know any of them or not:

- a. Ina Steiner
- b. David Steiner
- c. David
- d. eBay Inc.
- e. Devin Wenig
- f. Steve Wymer

- g. Wendy Jones
- h. James (“Jim”) Baugh
- i. David Harville
- j. Stephanie Stockwell
- k. Stephanie Popp
- l. Veronica Zea
- m. Philip Cooke
- n. Brian Gilbert

4. Have you ever followed news stories involving cyberstalking, online threats, or “trolling”?

- a. If so, did any of those stories leave strong impressions on you?

5. Do you have strong feelings about large corporations and whether they should be held responsible for the actions of their employees?

6. Do you believe a person can be traumatized by receiving threatening or disturbing messages or packages?

7. Do you have any negative or positive feelings about bloggers, online journalists, or critics of large companies?

8. How do you feel about the idea of private security teams conducting surveillance or investigations separate from law enforcement?

9. Do you believe corporate security teams should be allowed broad discretion to investigate people who criticize or threaten a company?

10. In your view, what limits should exist on corporate security teams when investigating conduct online?

11. Is there anything about receiving disturbing or threatening items, such as objects intended to frighten, that you think would or would not be harmful to someone?

12. Some people believe that individuals who carry out wrongful acts are solely responsible; others believe those who direct or encourage them bear responsibility as well. What are your thoughts?

13. Do you believe large corporations should be subject to punishment if a jury finds serious misconduct?

14. How do you feel about the idea that a corporation could be responsible for harm caused by employees acting on its behalf?

15. Do you think companies should be held responsible if someone in a leadership role encourages or approves misconduct?

16. Have you heard anything in the news or online about eBay, about executives at eBay, or about allegations of harassment involving eBay?

17. Is there any reason you feel you could not be fully fair and impartial to both sides in this case?

18. Without hearing any evidence, if the law allows and the proof supports a money verdict for emotional damages, would you be able to follow the law and award money damages for emotional harm?

Dated: November 20, 2025
Newburgh, New York

Respectfully submitted,

By: /s/ Andrew Finkelstein
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CC: All Counsel of Records via ECF